

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Rafael Beriguete	§	
Plaintiff	§	Case No.: 1:12-cv-01559-JPO
v.	§	
State Recovery, Inc.	§	
Nissan Motor Acceptance Corporation	§	
Asset Management Outsourcing Recoveries,		
Inc. d/b/a AMO Recoveries	§	
U.S. Recoveries d/b/a NYC Recoveries	§	
Defendants		

Motion For Entry of Default Against Defendant Asset Management Outsourcing Recoveries, only

1. Plaintiff Rafael Beriguete moves for default judgment against Defendant Asset Management Outsourcing Recoveries.
2. In support, Plaintiff attaches an “Affidavit For Entry of Default”, which includes by reference the relevant documents.

WHEREFORE, plaintiff requests the entry of Default as to Defendant Asset Management Outsourcing Recoveries.

Dated: Brooklyn, New York
October 10, 2012

Respectfully submitted,
/s/

Ahmad Keshavarz
ATTORNEY FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that on this date I served foregoing as follows: Via ECF to

Defendants State Recovery, Inc. and U.S. Recoveries d/b/a NYC Recoveries
By and through its attorney of record

John L. Russo, Esq.

31-19 Newtown Ave., Suite 500

Astoria, New York 11102

P: (718) 777 – 1277

and

David A. Brodsky, Esq.

GREENWALD LAW OFFICES

99 Brookside Avenue

Chester, New York 10918

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Defendant Nissan Motor Acceptance Corporation

By and through its counsel

Jack Gross

The Chartwell Law Offices, LLP

One Battery Park Plaza, 35th Floor

New York, New York 10004

P: (212) 968-2300

Via first class mail and CMRR to

Defendant Asset Management Outsourcing Recoveries

5644 Peachtree Ind. Blvd., Ste. 213

Norcross Georgia 30092

Dated: Brooklyn, New York

October 10, 2012

/s/

Ahmad Keshavarz

ATTORNEY FOR PLAINTIFF